

**STATE OF ALABAMA  
COUNTY OF MONTGOMERY**

**AFFIDAVIT OF DAROLYN (Nikki) GIBSON**

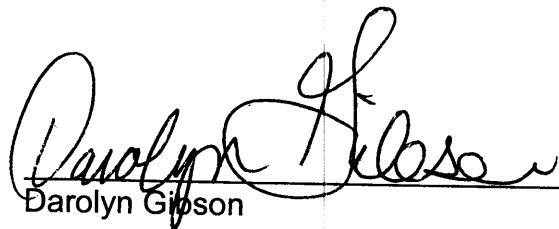
I am Darolyn Gibson, and I do solemnly swear that the following is true and correct to the best of my ability:

1. I am over the age of nineteen years old and a graduate of Auburn University of Montgomery (AUM), Montgomery, Alabama. My address is 500 Eastdale Road South, Apt. E21, Montgomery, Alabama 36117.
2. As a student at AUM, I was assigned as a student worker in the Dean's Office, School of Sciences. I worked in the Dean's Office from 2002-2005.
3. During that time, I had the opportunity to observe Dr. Chris MaHaffy, who is in a way frightening and intimidating. At one time, I was assigned to Dr. MaHaffy for two weeks by Ms. Ellison to work on the "Jason Project," in 2004.
4. As a student worker, I observed Dr. MaHaffy come into the Dean's Office wearing a t-shirt, which had redneck on it. He went to Ms. Ellison's desk and showed it to her.
5. I was shocked to see a Doctor at AUM actually wearing a t-shirt that can be considered racial.
6. Immediately, after Dr. Bayo Lawal received the position as Dean, Dr. Chiris MaHaffy seemed to be offended that Dr. Lawal had the position and he would begin to walk in the Office of the Dean and not speak, not recognize/acknowledge that any African Americans were in the office, of course, he would go straight to his mailbox and pick up the mail and leave out.
7. Dr. MaHaffy seemed threatening, whereas he would walk in with an agnry demeanor as though he was upset on many occasions.
8. Also, I heard Allison Stevens, a Caucasian employee screaming in a loud tone at Cynthia Ellison, I knew that Allison really did not like Ms. Ellison.
9. One day, I was at work, Dr. Bayo Lawal rushed Ms. Ellison out of the office as requested by AUM. Later, Dr. MaHaffy came into the office with an angry look on his face went around to Ms. Ellison's cubicle. Later, I found out that AUM was investigating Dr. MaHaffy for a report Ms. Ellison had made against him.

**EXHIBIT**

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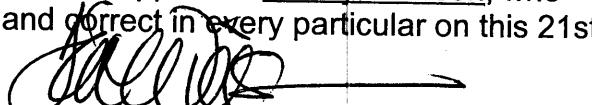
10. Ms. Ellison became so fearful of Dr. MaHaffy and was concerned that he may even come to her house and harm her. I remember Ms. Ellison was concerned about not getting security, whereas everyone else was receiving security.
11. After going back and analyzing everything that I can remember during my work study, I now believe that Cynthia Ellison was discriminated.



Darolyn Gibson

**STATE OF ALABAMA  
COUNTY OF MONTGOMERY**

BEFORE me, the undersigned Notary Public, appeared Darolyn Gibson, who known to me, do swear the foregoing is true and correct in every particular on this 21st April 2006 at 4:30 p.m.



NOTARY PUBLIC STATE OF ALABAMA AT LARGE  
MY COMMISSION EXPIRES: Apr 3, 2007  
NOTED THRU NOTARY PUBLIC UNDERWRITERS